

HONORABLE JUDGE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICHAEL WRIGHT and ALEXIS WRIGHT,  
a married couple,

Plaintiff,

vs.

STATE FARM FIRE & CASUALTY  
COMPANY, a foreign insurer,

Defendant.

Case No. 2:23-cv-00179-JNW

**DECLARATION OF HEATHER N.  
DERENSKI IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT'S MOTION TO SEAL**

[NOTE ON MOTION CALENDAR  
DECEMBER 9, 2024]

1. I am over the age of eighteen and competent to testify. I am Plaintiffs' counsel in this case. This declaration is based on my personal knowledge.

2. I understood the documents filed as Dkt. No. 61-10 were provided to Plaintiffs' counsel in response to a request for public records from the *Gamble v. State Farm* 3:19-cv-05956-MJP trial. I reviewed the court's docket in the *Gamble* trial and reasonably believed that both "Exhibit 15" and "Exhibit 16" had been admitted as trial exhibits, prior to filing Dkt. No. 61-10. Any error in this belief was unintentional.

After receiving Defense counsel Hicks' challenge regarding the public availability of the documents and request to seal, I reviewed the court's record. When I could not locate a record

1 regarding "Exhibit 16" which I previously believed I reviewed prior to filing Dkt. No. 61-10, I  
2 contacted the court. The court informed me they would have someone respond to my inquiry. I  
3 have not yet received a response. I was also unable to locate a document in the court's record  
4 following the admittance of "Exhibit 15" that required the return or destruction of the documents.

5 Plaintiffs' counsel maintained the documents as confidential, and have not shared or  
6 otherwise used the documents after the notification the documents were protected.

7  
8 Signed under penalty of perjury in Snohomish Washington December 4, 2024.

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11 *s/Heather N. Derenski*  
12 Heather N. Derenski  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify under penalty of perjury under the laws of the State of Washington that on  
3 December 4, 2024, I caused one true copy of the foregoing document with exhibits to be served in  
4 the manner indicated below:

5  
6 **Attorney for Defendant**  
7 **State Farm Fire & Casualty Company**  
8 James D. Hicks  
9 SINARS SLOWIKOWSKI TOMASKA LLC  
10 221 1<sup>st</sup> Avenue W, Suite 200  
11 Seattle, WA 98119  
12 (206) 705-2115  
13 jhicks@sinarslaw.com

- ☐ U.S. Postal Service  
☐ Facsimile  
☐ E-Mail  
☒ E-Service/ECF  
☐ Hand Delivery  
☐ Via Legal Messenger Service

14 DATED December 4, 2024, in Snohomish, Washington.

15 CEDAR VIEW LAW, PLLC

16 s/Heather N. Derenski  
17 Heather N. Derenski, Attorney